

**Via ECF**

October 28, 2019

Hon. Gregory H. Woods  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007-1312

**Re: State Street Global Advisors Trust Company v. Visbal, Case No. 1:19-cv-1719-GHW**

Dear Judge Woods:

We write jointly pursuant to Your Honor's individual rules and practices to request an adjournment of certain upcoming deadlines, given the Court's recent extension of the fact discovery deadline. *See* Dkt. No. 141. The Court extended the fact discovery deadline to December 3, 2019, to accommodate a request from Judge Steward of the Federal Court of Australia that the deposition of Ms. Rebecca Hanlan for the purpose of the above-captioned proceeding take place after she has testified in the Australian trial, which is scheduled to conclude on November 29, 2019. *See id.* Counsel for the parties have met and conferred and agree that an extension of the current expert discovery deadlines is desired so that expert discovery may proceed upon the closure of fact discovery. The parties also agree that the deadlines for motions for summary judgment should be extended to allow sufficient time for preparation of such motions following the closure of expert discovery. In addition, the parties request that the Court postpone the post-discovery status conference (and related status update letter) currently scheduled for December 19, 2019, so that it occurs after the completion of all expert discovery and may also serve as the pre-motion for summary judgment conference as contemplated in Paragraph 10 of Your Honor's civil case management plan form.

In light of the scheduling changes, we propose the following schedule for the upcoming deadlines:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Deadline for every party-proponent of a claim (including any counterclaim, cross-claim, or third party claim) that intends to offer expert testimony in respect of such claim to make the disclosures required by Fed. R. Civ. P. 26(a)(2)	November 4, 2019	December 3, 2019
Deadline for every party-opponent of such claim that intends to offer expert testimony in opposition to such claim to make the disclosures required by Fed. R. Civ. P. 26(a)(2)	November 18, 2019	December 17, 2019

Completion of all expert discovery	December 23, 2019	January 17, 2020
Parties to file a joint letter updating the Court on the status of the case	December 12, 2019	January 25, 2019
Status conference	December 19, 2019	January 31, 2019, or other date following the close of expert discovery at the Court's convenience
Deadline to file motions for summary judgment	January 22, 2020	February 17, 2020

A proposed Revised Civil Case Management Plan and Scheduling Order is attached hereto as Exhibit A.

There will be no prejudice to either party based on an adjournment of these dates. Though this is the second request for adjournment of these deadlines, we believe a corollary extension is warranted in light of the recent extension of the fact discovery deadline.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/ Michael F. Autuoro

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